

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Rohit Prakash,)	CASE NO. 5:10-cv-00033
)	
Plaintiff,)	JUDGE SARA LIOI
)	
vs.)	<u>MOTION OF DEFENDANT</u>
)	<u>IMPERIAL TOBACCO GROUP PLC</u>
Altadis U.S.A. Inc., <i>et. al.</i> ,)	<u>TO DISMISS FOR LACK OF</u>
)	<u>PERSONAL JURISDICTION</u>
Defendants.)	

Defendant Imperial Tobacco Group PLC (“Imperial”) respectfully moves this Court, pursuant to Fed. R. Civ. P. 12(b)(2), for an order dismissing it for lack of personal jurisdiction, because Imperial has no connection to the United States and exercising jurisdiction over Imperial would offend Constitutional notions of fair play and substantial justice.

This Motion is supported by the Memorandum and Declaration of Robert Dyrbus filed herewith, and by the Memorandum filed in support of Defendants’ Joint Motion to Dismiss [Dkt. No. 26], which is incorporated by reference.

DATED: April 7, 2010

Respectfully submitted,

/s/ Deborah A. Coleman

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CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2010, this *Motion of Defendant Imperial Tobacco Group PLC to Dismiss For Lack of Personal Jurisdiction* was filed electronically and a copy was sent to Rohit Prakash, *pro se*, via regular U.S. mail, 1510 South Hametown Road, Copley, Ohio 44321.

/s/ Deborah A. Coleman

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